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May 19, 2025

Re: *Foley, et al., v. Union de Banques Arabes et Françaises*, No. 22-cv-1682-ER

Hon. Edgardo Ramos
U.S. District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Dear Judge Ramos:

Pursuant to Rule 3.ii of Your Honor's Individual Practices, we write on behalf of Defendant Union de Banques Arabes et Françaises ("UBAF") to respectfully request that the Court redact and maintain under seal a very limited portion of the public version of the transcript for the April 22, 2025 status conference (the "Status Conference") to preserve confidential information that UBAF is prohibited from disclosing under French law.

The Court's Notice of Filing of Official Transcript provides that "[p]arties wishing to request redaction of other information [than that provided in FRCP 5.2] may proceed by motion." Dkt. No. 96. Accordingly, UBAF filed its Notice of Intent to Request Redaction on May 14, 2025. Dkt. No. 97. Now, UBAF hereby moves for a redaction to be applied to the Status Conference transcript. Accompanying this letter motion, we are filing publicly a copy of the Status Conference transcript with the proposed redaction and are electronically filing under seal a copy of the same with the proposed redaction highlighted.

UBAF's proposed redaction concerns the suggested identity of one of its customers. At the Status Conference, Plaintiffs speculated about the identity of one of UBAF's customers, which was derived from UBAF's confidential information. Under French Law, UBAF is prohibited from disclosing client confidences, such as client identities, to third parties. See Decl. N. Lenoir, Dkt. No. 81 at 27. Another court facing the same French banking secrecy law required that certain information regulated under that law, including the identity of the French bank's customers, be redacted and filed under seal in court filings. See *Strauss v. Credit Lyonnais, S.A.*, 2011 WL 4736359, at *5, *8 (E.D.N.Y. Oct. 6, 2011); see also *Dodona I, LLC v. Goldman, Sachs & Co.*, 119 F. Supp. 3d 152, 156 (S.D.N.Y. 2015) (sealing "identities of [party and non-party financial institutions'] customers").

Accordingly, UBAF respectfully requests that the Court maintain under seal, in part, the Status Conference transcript and make available on the Court's public docket only the redacted transcript, reflecting UBAF's proposed redaction. We have conferred with counsel for Plaintiffs, and Plaintiffs have said that, while they do not believe the requested relief is necessary, they do not oppose the relief sought.

Respectfully Submitted,

/s/ Ben S. Kaminetzky

Ben S. Kaminetzky

cc: All Counsel (via ECF)